

## REMARKS

The above Amendments and these Remarks are in reply to the Office Action mailed October 5, 2004.

Currently, claims 18-20, 37-39 and 41-43 are pending. Applicants have amended claims 37-39; cancelled claims 1-8, 10-12, and 40; and added new claims 41-43. Applicants respectfully request reconsideration of all pending claims.

In the Office Action, the Examiner rejected claims 1-6 and 8-12 as being anticipated under 35 U.S.C. §102(b) by DiCicco. Applicants note that §102(b) requires that “the invention was patented or described in a printed publication in this or a foreign country or in public use or on sale in this country, more than one year prior to the date of the application for patent in the United States.” DiCicco was patented on April 6, 1999. Applicants patent application claims priority to U.S. Patent 5,917,553, which was filed October 22, 1996; therefore, Applicants assert that DiCicco is not prior art under §102(b).

Nevertheless, Applicant has cancelled claims 1-8 and 10-12 for strategic reasons in order to focus the application on claims 37-43.

Claims 37-29 were rejected under 35 U.S.C. §103(a) as being obvious in view of DiCicco and Rosser. Claims 37-39 have been amended to recite “sensing field of view data for a camera using one or more field of view sensors that do not use image recognition” and that the determination of the location’s position in the video is performed “using said field of view data.” Neither DiCicco nor Rosser teaches the use of field of view sensors to perform the methods of claims 37-39. For example, Rosser teaches a system of finding a target area in a video using pattern recognition. (Rosser, col. 7, line 58 – col. 8, line 23). Similarly, DiCicco teaches the use of image recognition to find various images of landmarks within the image. (see DiCicco, col. 4, lines 21-32; col. 8, lines 58-60; col. 6, lines 40-42). The only reference DiCicco makes to field of view sensors is to suggest not using them. For example, at column 1, lines 53-56, DiCicco notes that field of view sensors produce an unacceptable jitter that is “particularly objectionable during occlusion processing.” Applicants note that claims 37-39 are directed to occlusion processing (e.g., “said step of adding includes adding said line to one or more portions of said video that are not occluded and not adding said line to one or

more portions of said video that are occluded” of claims 37-39”). Neither DiCicco nor Rosser teach or suggest the performance of occlusion processing (e.g., “said step of adding includes adding said line to one or more portions of said video that are not occluded and not adding said line to one or more portions of said video that are occluded” of claims 37-39”) in a system that uses data from field of view sensors to determine a target location.<sup>1</sup>

Therefore, Applicants assert that combining DiCicco and Rosser does not teach or suggest all of the limitations of claims 37-39.

Claims 41-43 are patentable over the cited prior art because the cited prior art does not teach the use of field of view sensors in combination with the two step process recited in the claims.

Based on the above amendments and these remarks, reconsideration of all pending claims is respectfully requested. The Examiner’s prompt attention to this matter is greatly appreciated. Should further questions remain, the Examiner is invited to contact the undersigned attorney by telephone. Enclosed is a PETITION FOR EXTENSION OF TIME UNDER 37 C.F.R. § 1.136 for extending the time to respond up to and including April 5, 2005. The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 501826 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

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<sup>1</sup> Applicants disagree with the Examiner’s assertion on page 7 of the Office Action that “Official notice is taken that it was well known in the art at the time the invention was made that a first-down yard line was a well known field line in a football game at the time the invention was made.” Applicants assert that a first down line is not a well known field line.